

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HOP HOP PRODUCTIONS, INC.,
and FALEENA HOPKINS,

Plaintiffs,

- against -

KEVIN KNEUPPER, TARA CRESCENT,
and JENNIFER WATSON,

Defendants.
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Civil Action No.:

**DECLARATION OF
CHRIS CARDILLO IN
SUPPORT OF PLAINTIFFS'
MOTION**

18 CV 4670

Chris Cardillo, Esq., declares under penalty of perjury, pursuant to 28 U.S.C.

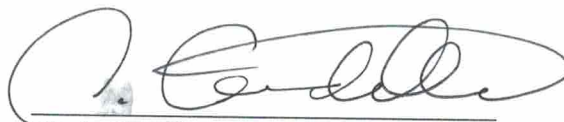
§ 1746, that the following is true and correct:

1. I am a partner in the law firm of C. Cardillo, P.C. attorney for the Plaintiffs HOP HOP PRODUCTIONS, INC. (hereinafter "HOP") and FALEENA HOPKINS (hereinafter "HOPKINS" and collectively "PLAINTIFFS").
2. I submit this declaration in support of Plaintiffs' motion for a) a temporary restraining order, pursuant to Rule 65 of the Federal Rules of Civil Procedure, enjoining and restraining defendants TARA CRESCENT (hereinafter "CRESCENT") and JENNIFER WATSON (hereinafter "WATSON") during the pendency of this action from promoting, advertising, selling, and/or distributing any works which infringe upon the PLAINTIFFS' trademarks, including but not limited to the "Cocktales, The Cockiest Anthology" (hereinafter "Cocktales"), or any publications which include the Federally Registered Trademarks (as defined in the related Verified Complaint), or any similar variations thereof meant to confuse the public, and b) for an automatic stay of defendant KEVIN KNEUPPER'S ("KNEUPPER") Petition for Cancellation before the Trademark Trial and Appeals Board concerning PLAINTIFFS' federally registered trademark of "Cocky".

3. This declaration is made upon personal knowledge, except where otherwise noted.
4. Plaintiffs are the only owner of a registration for the word and stylized mark of “cocky” as described fully in the Verified Complaint, attached to the accompanying Memorandum of Law as **Exhibit “1”**.
5. Attached to the Complaint filed with the Court in this matter as **Exhibits “E”** through **“H”** are true and correct copies of the trademark applications and registrations for the “cocky” word and stylized mark.
6. Attached to the Complaint filed with the court are **Exhibits “A”** through **“P”** (hereinafter “Exhibits”). As to the Exhibits I declare that each and every one is a true, accurate and correct copy of what they purport to represent.
7. In addition, on May 25, 2018 I contacted the Defendants, to inform them I would be appearing today in the Southern District of New York at approximately 4 pm to file this pending Order to Show Cause for a Preliminary Injunction and Temporary Restraining Order, and its related Complaint. To wit:
 - a. I emailed KNEUPPER at the email address of kneupper@gmail: the email address indicated on his Petition for Cancellation filed with the Trademark Trial and Appeal Board;
 - b. I emailed CRESCENT at the email address of taracrescent@gmail.com: the email address indicated on her website (taracrescent.com). In addition, I emailed Eleanor Lackman, Esq. (elackman@cdas.com), who, as per a letter sent on May 16, 2018 to PLAINTIFFS’ trademark attorney, represents Crescent.
 - c. I emailed WATSON at the email address of info@socialbutterflypr.net: the email address indicated on her company’s website (socialbutterflypr.net). Because this was

a general email I did not include specifics about the lawsuit, but instead asked WATSON to contact me immediately on a legal and time sensitive matter. All three emails as well as Ms. Lackman's letter are attached to the Order to Show Cause as **Exhibit "2"**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this Declaration on May 25, 2018 in Brooklyn, New York.



Chris Cardillo